

**A BIOLOGICAL RESOURCES SURVEY REPORT
FOR THE
DOTTS SUBDIVISION PROJECT
TM 5300RPL5, LOG NO. 02-14-054
APN 520-012-15
COUNTY OF SAN DIEGO**

Prepared for

Mr. Stan Dotts
2550 Willow Glen Drive
El Cajon, CA 92019

Prepared by

Vincent N. Scheidt
Certified Biological Consultant
3158 Occidental Street
San Diego, CA 92122
(858) 457-3873

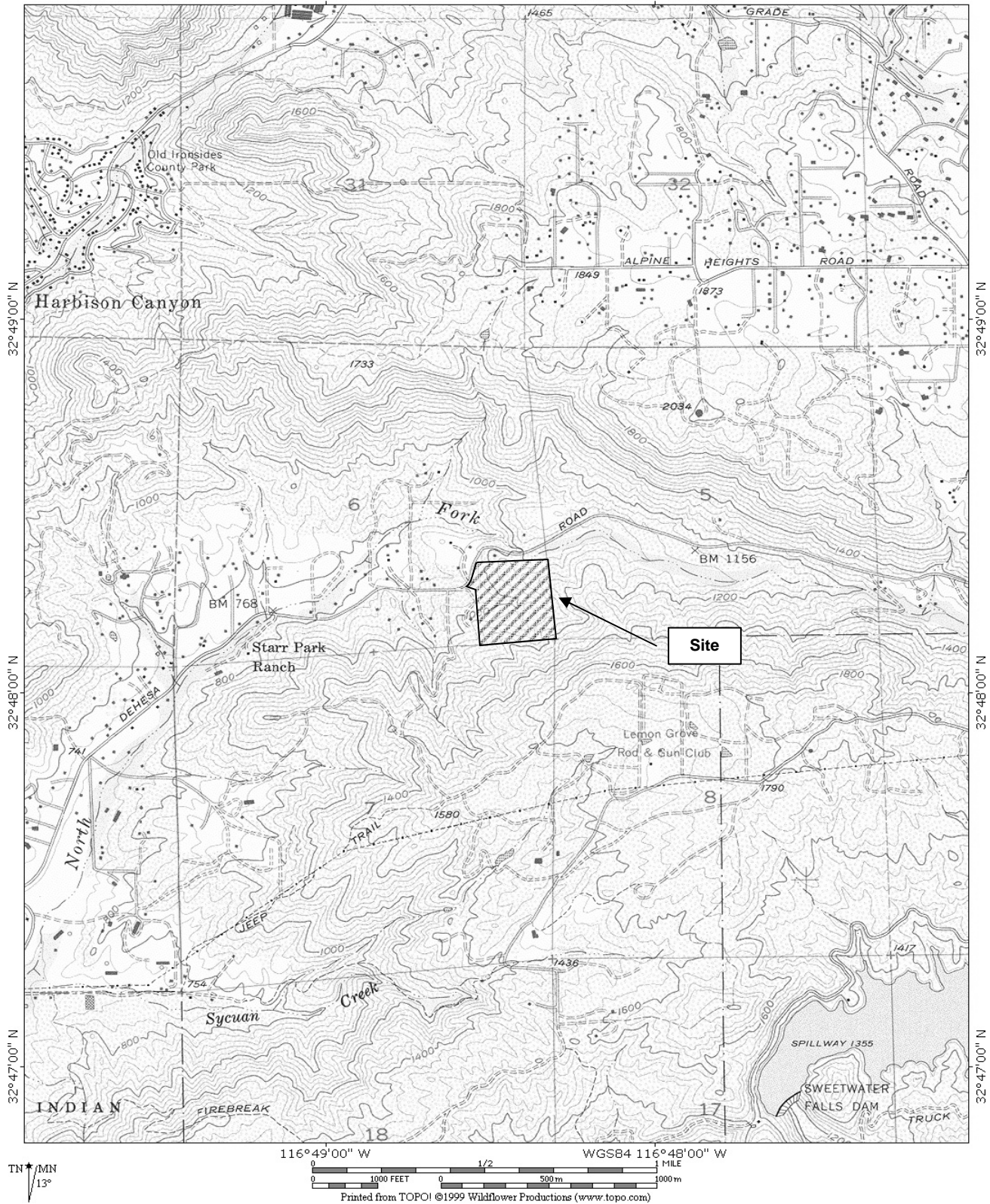
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Vincent N. Scheidt, MA
Certified Biological Consultant

**FIGURE 1. REGIONAL LOCATION - THE DOTTS SUBDIVISION PROJECT
PORTION OF THE USGS "ALPINE" 7.5' QUADRANGLE**

TOPOI map printed on 08/19/03 from "SanDiego.tpo" and "Untitled.tpg"
116°49'00" W WGS84 116°48'00" W



INTRODUCTION

This report addresses biological resources, project impacts, and MSCP/BMO/CEQA compatibility for the proposed Dotts Subdivision project. The project involves an approximately 38-acre parcel of vacant land located off Dehesa Road in the Dehesa Valley area of unincorporated San Diego County (Figure 1).

The Dotts subdivision property is located in a rural part of San Diego County, although there are homes in the vicinity. Other areas adjoining the property support similar native habitats including sage scrub, chaparral, riparian areas, and oak woodlands.

PROJECT AND SITE DESCRIPTION

Approval of the Dotts subdivision project would result in the creation of four new legal lots ranging in size between 5.40 and 19.34 gross acres each. It is assumed that four dwelling units would be built; one on each new lot, with additional units possible in the future. Primary access to the property would be from the northwest, off Dehesa Road.

The project site is mostly undeveloped, supporting steep slopes and areas of dense brush. Riparian forest habitat is present near the northeastern end of the property. Other areas support mostly coastal sage scrub and chaparral vegetation. Elevations onsite range between approximately 925 feet MSL near site's western edge and 1,185 site's feet MSL at the site's highest point at the southeastern corner. This elevational differential suggests the site's overall steepness. The soil-types found onsite consist of Vista coarse sandy loams (VsD) on slopes between 5 and 9 percent, Visalia sandy loam soils (VaD) on slopes between 9 and 15 percent, Vista coarse sandy loams (VsE) and Vista rocky coarse sandy loams (VvE) on slopes between 15 and 30 percent, and Vista coarse sandy loams (VsG) on slopes between 30 and 65 percent. These soil-types are not known to support significant populations of narrow endemics or other very rare plants or animals.

PURPOSE OF STUDY

The purpose of this study was to inventory the property for biological resources, identify and map onsite habitats, and search for signs of rare, endangered, threatened, or otherwise sensitive plants or animals which could occur here. These data were used in an assessment of biological resource values. This analysis allows a determination of project-related direct and indirect impacts, as required by the California Environmental Quality Act (CEQA), and mitigation, if appropriate and necessary. It is expected that the development of the property and associated improvements will result in measurable losses of biological resource values, necessitating mitigation.

METHODS

Field surveys of the Dotts property were completed in June, August, and September of 2002, and February and March of 2003. The specific dates, personnel, and weather conditions are presented in Table 1. Investigators included the author (VS) and Shannon M. Allen, Biological Consultant (SA).

Table 1. Field Surveys – The Dotts Subdivision Project Site

<u>Date</u>	<u>Hours</u>	<u>Personnel</u>	<u>Conditions</u>
20 June '02	12:00-13:30	VS, SA	clear, temps in the mid 60's, light westerly breeze
23 August '02	11:00-12:15	SA	clear, temps in the mid 80's, light westerly wind 1-2 MPH
2 September '02	08:30-12:00	VS, SA	partially cloudy skies, high 80's to low 90's, no wind
11 September '02	07:30-09:30	SA	clear skies, 70°-78°, no wind
18 February '03	13:45-16:10	VS, SA	clear, temps in the mid 60's, light westerly wind 0-4 MPH
1 March '03	14:00–14:00	VS, SA	partially cloudy, temps low 60's, winds 3-5 MPH from SW
5 March '03	15:00–16:15	SA	clear, sunny, temps mid 60's, winds 0-2 MPH from SW
14 March '03	14:00-15:45	VS, SA	clear, temps mid 60's/low 70's, winds 2-5 MPH from SW
20 March '03	08:50-11:05	SA	clear, temps mid 60's/low 70's, winds 1-3 MPH from W

All plants, animals and habitats encountered during the survey periods were noted in the field. Remote areas or areas supporting very dense brush were surveyed with binoculars. The limits of each habitat-type were mapped in the field utilizing an aerial photograph of the property. All plants and animals identified in association with the property are listed in Table 2 at the end of this report. Plants were identified *in situ*, or based on characteristic floral parts collected and later examined in detail. Floral nomenclature used in this letter follows Hickman (1993) and others. Plant communities, as designated by numerical code, follow Holland (1996, as amended).

Wildlife observations were made opportunistically. Binoculars were used to aid in observations and all wildlife species detected were noted. Animal nomenclature used in this report is taken from Stebbins (1985) for reptiles and amphibians, American Ornithologist's Union (1983, as updated) for birds, and Jones, et. al (1992) for mammals.

Several directed field surveys were conducted in conjunction with the biological study of this property. These included a directed California Gnatcatcher survey, a jurisdictional wetland survey, a Quino Checkerspot Butterfly Flight Season survey, and habitat evaluations for Arroyo Southwestern Toad, Least Bell's Vireo, and other sensitive species. Each of the directed surveys followed approved protocols to maximize detection of the respective biological resources, if present.

RESULTS

Habitats

The Dotts subdivision project site supports four broadly overlapping to relatively discrete plant associations. These are (1) Diegan Coastal Sage Scrub and (2) Southern Mixed Chaparral covering the majority of the property, with small areas of (3) Southern Coast Live Oak Riparian Forest and (4) Urban/Developed Habitat at the periphery. The approximate configuration of each of the onsite habitats is shown in Figure 2.

Diegan Coastal Sage Scrub (Holland Code 32500) – 14.75 acres

Most south-facing slopes of the property support Diegan Coastal Sage Scrub (CSS) vegetation. Indicators in this habitat include California Sagebrush (*Artemisia californica*), Flat-top Buckwheat (*Eriogonum fasciculatum*), Laurel Sumac (*Malosma laurina*), Yellow Bush Penstemon (*Keckiella antirrhinoides*), White Sage (*Salvia apiana*), and other native shrubs and subshrubs. This vegetation is well developed and of a high quality, supporting various sensitive species such as Palmer's Ericameria, Orange-throated Whiptail, and others.

Southern Mixed Chaparral (Holland Code 37120) – 23.38 acres

North-facing slope areas support Southern Mixed Chaparral (SMC) vegetation. This community is indicated by Chamise (*Adenostoma fasciculatum*), Mission Manzanita (*Xylococcus bicolor*), Interior Scrub Oak (*Quercus agrifolia*), and other hard-woody shrubs. The chaparral onsite is diverse and in generally excellent condition. This vegetation-type is also contiguous offsite on adjoining properties to the north, and contiguous with the CSS and oak woodland habitats located nearby. Portions of this habitat overlap with the adjacent areas of coastal sage scrub. These ecotonal areas could qualify as coastal sage – chaparral scrub, a related habitat-type.

Southern Coast Live Oak Riparian Forest (Holland Code 71160) – 0.46 acres

Indicators in this habitat include Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Western Cottonwood (*Populus fremontii*), Arroyo Willow (*Salix lasiolepis*), and California Sycamore (*Platanus racemosa*). Understory species detected include Desert Grape (*Vitis girdiana*), Poison Oak (*Toxicodendron diversilobum*), Douglas Sagewort (*Artemisia douglasiana*), and many others.

Urban/Developed (Holland Code 12000) – 0.24 acres

Urban/Developed Habitat is found in a strip along the southwestern edge of the property where the adjacent property owner has encroached onto the site with brush management. Indicators in this habitat include low weeds, such as Tocalote (*Centaurea melitensis*) and other weedy annuals. This portion of the property adjoins developed homes, and is regularly mowed for fire control.

Plants

Seventy-six species of vascular plants were detected on the Dotts property. The plant species observed typify the diversity normally found in chaparral, sage scrub, woodland, riparian, and disturbed areas in the interior foothill areas of San Diego County. A complete list of the plants detected, listed alphabetically, can be found in Table 2, attached. This list would be expected to represent at least 80 percent of the naturalized plants occurring on this site. Four of the plants observed are considered sensitive in San Diego County. These are San Diego Sagewort, Palmer's Ericameria, Engelmann Oak and San Diego County Vigiera. These are discussed subsequently.

Animals

Thirty-four species of animals were observed using the project site. These are generally common species, abundant in the site's general vicinity. Animals observed onsite are listed in Table 2, attached. Three of the animals observed are considered sensitive in San Diego County. These are Orange-throated Whiptail, Bobcat, and Bewick's Wren. Each of these is discussed subsequently.

SENSITIVE RESOURCES

Sensitive Vegetation Communities

Vegetation communities (habitats) are generally considered "sensitive" if; (a) they are recognized by the County's Resource Protection Ordinance as being generally depleted; (b) they are considered rare within the region by local experts, (c) if they are known to support sensitive animal or plant species; and/or (d) they are known to serve as important wildlife corridors. These sensitive habitats are typically depleted throughout their known ranges, or are highly localized and/or fragmented.

All of the native plant communities on the Dotts site are considered sensitive insofar as they support sensitive species. These are:

- Diegan Coastal Sage Scrub
- Southern Mixed Chaparral
- Southern Coast Live Oak Riparian Forest

All of these communities are all also locally depleted, particularly the riparian habitat. Southern Coast Live Oak Riparian Forest is considered the most sensitive of this group, followed by Diegan Coastal Sage Scrub and Southern Mixed Chaparral, in roughly that order.

Wetlands and Waters

"Waters of the United States" and *"waters of the State"*, as they are defined by the U.S. Army Corps of Engineers (ACoE), the California Regional Water Quality Control Board (CRWQCB), and the California Department of Fish and Game (CDFG), respectively, are present in two disjunct areas of the Dotts subdivision project site (Figure 2). These are associated with:

- (1) A dissected drainage system that bisects the property. This drains from the central and southern portions of the property on proposed lot 4 in a westerly direction, eventually draining into the Sweetwater River, which is located offsite to the northwest.
- (2) The northern edge of the property, which contains a small portion of the Sweetwater River at a bend in Dehesa Road on proposed lot 1.

A wetlands survey was completed for this project in August and September of 2002 as a part of the baseline surveying of the property. The results of this survey are illustrated in Figure 2. All drainages and low-lying areas were examined in the field for the presence of wetland indicators, including hydrophytes, hydric soils, or wetlands hydrology. Where all three criteria are met, the area would most likely qualify as a "federal" wetland, as defined by the ACoE and other federal agencies. The State of California (CDFG, others) recognizes "wetlands" based on a requirement for the presence of only one of the three criteria above (hydrophytes, hydric soils, or wetlands hydrology). Only one must be present in order to delineate an area as a state wetland.

None of the wetland areas associated with #1 above qualify under the Unified Federal Method as federal jurisdictional wetlands. The areas described in #1 do qualify as state (CDFG) wetlands, however, insofar as they support one or more (but not all three) of the requisite criteria. The area associated with #2 above does appear to qualify as a federal jurisdictional wetland. All areas mapped in Figure 2 as wetlands also meet the criteria of "waters of the United States" and "waters of the state".

Recent revisions to the County of San Diego's Resource Protection Ordinance (RPO) disqualify most of the onsite drainage areas as "County (RPO) Wetlands". This is because none of the three qualifiers (predominance of hydrophytes, undrained hydric soil, or non-soil substratum) are met except in that section of the Sweetwater River on proposed lot 1. Only this segment, therefore, is specifically protected under the RPO.

All measurable direct or indirect wetland impacts are subject to permitting by various state and federal agencies. Impacts normally trigger the need for a 1603 Streambed Alteration Agreement with the CDFG and Certification from the CRWQCB pursuant to the Clean Water Act or the Porter-Cologne Act.

Sensitive Plants

Four species of sensitive plants were observed on the Dotts subdivision property during the field surveys. These are San Diego Sagewort (*Artemisia palmeri*), Palmer's Ericameria (*Ericameria palmeri* ssp. *palmeri*), Engelmann Oak (*Quercus engelmannii*), and San Diego County Vigiera (*Viguiera laciniata*). These are discussed below. Sensitive plants are those listed as "Rare", "Endangered", "Threatened", "of Special Concern", or otherwise considered noteworthy by the MSCP, the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the California Native Plant Society (CNPS), or other conservation agencies, organizations, or local botanists.

San Diego Sagewort / *Artemisia palmeri*

CNPS RED code: 2-2-1, List 2

Federal/state status: none

San Diego County: Sensitive Plant List (DPLU, 1994)

BMO/MSCP "Group D" Plant (DPLU, 1997)

San Diego Sagewort is an unusual perennial herb with distinctive wand-like stems and dissected, revolute leaves. This rare plant occurs in semi-xeric riparian habitats and wet chaparral, ranging from northern San Diego County south into Baja California Norte, Mexico. San Diego Sagewort has been placed on List 2 ("Plants Rare or Endangered in California, but More Common Elsewhere") in the California Native Plant Society's *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 1998). This means that the species is considered to be "endangered in a portion of its range", "rare outside California," and "threatened by development", although "rare, but found in sufficient numbers and distributed widely enough that the potential for extinction is low at this time."

A small population of this species, consisting of a few dozen specimens, was observed on the Dotts subdivision project site, growing at the margins of the riparian forest. The specimens observed appeared in poor condition, presumably a result of the prolonged drought Southern California has experienced over the last few years. Only about twenty specimens were seen. This is not considered a locally or regionally significant population of this species, as much more substantial populations are present within a few miles of this site.

Palmer's Ericameria / *Ericameria palmeri* ssp. *palmeri*

CNPS RED code: 2-2-1, List 2

Federal/state status: none

San Diego County: Sensitive Plant List (DPLU, 1994)

BMO/MSCP "Narrow Endemic" species (DPLU, 1997)

Palmer's Ericameria is a medium-sized, bright-green shrub with yellow flower heads and tiny, inconspicuous leaves which appear to be highly glossy or shiny. Out of the flowering season, this plant in many ways resembles a large, bright green specimen of California Sagebrush (*Artemisia californica*), an extremely common sage scrub plant. Palmer's Ericameria normally occurs in rocky areas within Diegan Coastal Sage Scrub vegetation. The distribution patterns of this distinctive plant are poorly known, although it is frequently found on semi-steep south- or west-facing slopes that face broad, open valleys. Palmer's Ericameria is apparently restricted to less than ten sites in the United States, all within San Diego County and it is believed that the population discovered on this property represents the most easterly stand known. It also may represent an elevational record for this species in the US. The California Native Plant Society has placed *E. p.* ssp. *palmeri* on List 2 ("Plants Rare and Endangered in California but More Common Elsewhere") in the *Inventory of Rare and Endangered Vascular Plants of California* (CNPS, 1988). The CNPS RED code assignment of 2-2-1 indicates that the species is of an "occurrence confined to several populations or to one extended population" and "endangered in a portion of its range", although "more or less widespread outside California". Palmer's Ericameria is not protected by state or federal legislation.

A single local population of Palmer's Ericameria occurs on the Dotts subdivision project site. The population numbers approximately 60 specimens, all located in close proximity to one another. This constitutes a viable, self-sustaining population. Many other populations of this species are comprised by only about a dozen specimens. Palmer's Ericameria is considered a biologically-significant feature of the Dotts property.

Engelmann Oak / *Quercus engelmannii*

CNPS RED code: 1-2-2, List 4

Federal/state status: none

San Diego County: Sensitive Plant List (DPLU, 1994)

BMO/MSCP "Group D" Plant (DPLU, 1997)

Engelmann Oak is a distinctive, normally smallish tree characterized by stiff, bluish-green leaves with relatively smooth edges. It ranges in distribution from Los Angeles and Riverside Counties south into Baja California in cismontane areas. Engelmann Oak is listed on the California Native Plant Society's (CNPS, 1998) "watch-list" (*List 4; Plants of Limited Distribution*) in its *Inventory of Rare and Endangered Vascular Plants of California*. The CNPS considers this species as "rare, but found in sufficient numbers or is distributed widely enough that the potential for extinction is low at this time", although it is "endangered in a portion of its range" and "rare outside California". Engelmann Oaks are not protected by state or federal legislation.

A single Engelmann Oak is present on the northern edge of the site at the edge of the Riparian Forest. Other specimens are located nearby, and as a part of the riparian forest. Engelmann Oak is considered a biologically-significant site resource.

San Diego County Viguiera / *Viguiera laciniata*

CNPS RED code: 1-2-1; List 4

Federal/state status: none

San Diego County; Sensitive Plants List (DPLU, 1994)

BMO/MSCP "Group D" Plant (DPLU, 1997)

San Diego County Viguiera is a low, stiff, sage and succulent scrub shrub with bright yellow flower-heads and smallish, triangular, sandpapery leaves. This showy species occurs in coastal scrub, maritime scrub, and xeric chaparral, occasionally as a co-dominant from about Mission Valley in central San Diego County south to adjacent areas in northern Baja California along the coast and in foothill areas. Reported localities in San Diego County include Mission Valley, La Mesa, El Cajon, Portrero, Dehesa, Otay, and Tecate. Many populations are threatened by development, although it remains common where it occurs. San Diego County Viguiera is listed on the California Native Plant Society's (CNPS, 1998) "watch-list" (*List 4; Plants of Limited Distribution*) in its *Inventory of Rare and Endangered Vascular Plants of California*. The CNPS considers this species is "rare, but found in sufficient numbers or is distributed widely enough that the potential for extinction is low at this time", although it is "endangered in a portion of its range" and "rare outside California". San Diego County Viguiera is not protected by state or federal legislation

This species is relatively abundant onsite within the coastal sage scrub, with some areas supporting it as a co-dominant species. Because of the random distribution of this species within the habitat, avoidance is not possible, and mitigation will be provided pursuant to Article VII A(1)(c) of the BMO. Habitat-based mitigation would provide compensation for the loss of this relatively common species.

A variety of other sensitive plants are known from the general vicinity of the property. These are listed in Table 4. A few of these have a potential to occur onsite. However, none were found during the site surveys, in spite of a directed search, although during a severe and record-breaking drought. As discussed previously, the soil-types associated with this property do not normally support large numbers of endemic plant species.

Sensitive Animals

Four sensitive animals were detected on the subject property during the field surveys. These are Orange-throated Whiptail (*Cnemidophorus hyperythrus*), Bobcat (*Lynx rufus*), Mule Deer (*Odocoileus hemionus*), and Bewick's Wren (*Thryomanes bewickii*). Sensitive animals are those listed as "Rare", "Endangered", "Threatened", "of Special Concern" or otherwise noteworthy by the California Department of Fish and Game, the U.S. Fish and Wildlife Service, the National Audubon Society, the County of San Diego, or other conservation agencies, organizations, or local zoologists.

Orange-throated Whiptail / *Cnemidophorus hyperythrus*

"Threatened" (San Diego Herpetological Society, 1980)

"Fully Protected" (California Department of Fish and Game, 1988)

Federal Endangered Species Candidate; Former C2 (USFWS, 1996)

San Diego County; Sensitive Reptiles List (DPLU, 1994)

MSCP "Covered" species (DPLU, 1997)

The Orange-throated Whiptail is an alert and active diurnal ground lizard restricted to areas of relatively intact native vegetation where soils are sufficiently friable to allow burrowing and foraging. The United States distribution of this sensitive species is restricted to extreme southwestern California, where it ranges from Orange and Riverside Counties south into northern Baja California. It is relatively abundant where it still remains, although major portions of its former range have been lost to urbanization and agricultural land conversions, particularly in the coastal lowland.

Cnemidophorus hyperythrus beldingi is considered "threatened" by the San Diego Herpetological Society, is fully protected by the California Department of Fish and Game, and was until recently a Federal Endangered Species Candidate, level "C2". Level "C2" indicated a "taxon for which substantial biological information to support a proposed rule is lacking". This suggests that the species is too widespread and/or common to warrant formal federal listing as an Endangered or Threatened Species at present. Category C2 was eliminated in February 1996. This species remains on the County of San Diego's "Sensitive Reptiles" list, however. Approximately 65 to 75% of the documented historical distribution of this species has been replaced by urban and agricultural developments.

Several specimens of this cryptic lizard species were observed during the various field surveys. Detection of this small and rapidly-retreating species is often difficult, and specimen counts are frequently low as a result of this. Hence, specimens are anticipated in most open areas of the site, particularly adjacent to areas of dense brush. Orange-throated Whiptail is a "covered" species under the County's MSCP Subarea Plan.

Bobcat / *Lynx rufus*

Regulated Furbearer (CDFG, 1999)

Bobcat is a well-known but secretive species that ranges from Southern Canada to central Mexico. This nocturnal species occurs mostly in brushy areas, including chaparral, sage scrub, woodlands, and forests. Although not considered rare or endangered at this time, it is a regulated furbearer in California.

Bobcat scats and tracks were observed along the upper ridge area of the property, suggesting movement throughout most of the site. As a regulated game animal, hunting of this species is controlled by the California Department of Fish and Game.

The size and configuration of the subject property suggests that no more than 1-2 specimens could be expected to utilize this property. Specimens almost certainly roam onto undisturbed areas to the south and east.

Mule Deer / *Odocoileus hemionus*

MSCP indicator (County of San Diego, 1992)

San Diego County; Sensitive Mammal List (DPLU, 1994)

Mule Deer is the unmistakable, large ruminant occurring over large areas of the American southwest. This species, while clearly not becoming rare or endangered, is listed on the County of San Diego's sensitive mammal list because it is an indicator of high-quality wildlife habitat, as defined by the MSCP working group. This species is a regulated game species in California, under jurisdiction of the California Department of Fish and Game.

Scats and shed horns characteristic of Mule Deer were seen in several places on the project site. The largest concentrations were observed in the more remote areas, such as along the central ridge. As an MSCP indicator, the presence of Mule Deer on the subject property provides evidence of relative habitat quality. However, Mule Deer remain common throughout much of the West, and, hence are not considered a significant biological resource of the subject site, *per se*.

Bewick's Wren / *Thryomanes bewickii*

"Blue List" (Tate, 1986).

Bewick's (pronounced "Buick's") Wrens are small, aggressive birds, which occupy a wide variety of habitats in San Diego County from the coast into the desert. Numbers of this species appear to be relatively stable in our area, although the species is on the decline in other parts of the country.

At least four specimens occur onsite. All were seen in association with areas of denser chaparral or the periphery of the riparian forest area. This songbird is relatively common onsite, and ample nesting habitat is available. Numbers of this species appear to be relatively stable in San Diego County, although the species is on the decline in other parts of the US.

Other sensitive animals known from the general vicinity of the property are listed in Table 4. A few of these probably occur onsite, at least on an occasional basis, particularly certain wide-ranging foragers, such as various species of rare bats, various raptors, certain other rare reptiles etc.

California Gnatcatcher Survey

California Gnatcatcher (*Polioptila californica*), a federally-listed Threatened songbird, is known from habitat superficially similar to that found on this site. Gnatcatchers occur in coastal and interior areas supporting coastal sage and related scrub habitats typically dominated by California Sagebrush, Flat-top Buckwheat, Laurel Sumac, and other soft-woody shrubs. A directed field survey for this species, pursuant to current surveying protocols, was conducted by the author and Shannon M. Allen in August and September of 2002, pursuant to the requirements of Federal 10(a) Permits # TE 87888133 and # TE 038065. These surveys did not reveal the presence of *P. californica*. Therefore, the Diegan Coastal Sage Scrub on this site is considered "unoccupied" by the federally listed Threatened Species.

Quino Checkerspot Butterfly Flight Season Survey

Quino Checkerspot Butterfly (*Euphydryas editha quino*), a federally-listed Endangered Butterfly, is known from habitat similar to that found on the subject site. A directed Flight Season Survey for Quino Checkerspot Butterfly was conducted as a part of the analysis for this report in February and March of 2003 (Table 1). All field surveys followed the current (2002) survey protocol for this species pursuant to the requirements of our Federal ESA Section 10 (A) (1) (a) Recovery Permits for this species, # TE 87888133 and # TE 038065.

Eleven species of locally-common butterflies (Table 2) were detected during the surveys. However, Quino was not detected at any time during any of the fieldwork. As a result of this survey, it appears certain that Quino does not occur in association with the subject property at this time.

Arroyo Toad Habitat Evaluation

Arroyo Toad (*Bufo microscaphus californicus*), a State and Federally listed Endangered amphibian, occurs in open, exposed riparian habitats with sand and gravel banks, interspersed with shallow, slow-moving water. The drainage areas on the Dotts site were searched for suitable habitat, however, none was detected, and hence Arroyo Toad is not expected to occur on this property as a breeding species. The nearest known breeding populations of this rare anuran are found in Viejas Creek, several miles to the north. Specimens are also known from the lower Sweetwater River. However, all known breeding areas are separated from this site by several miles, so the chances for *B. microscaphus* to occur onsite as an upland aestivator (within 1 km of a breeding area) are considered low, given the distance from known breeding areas.

Least Bell's Vireo Habitat Evaluation

Least Bell's Vireo (*Vireo bellii pusillus*), a State and Federally listed Endangered migratory songbird, occurs in dense willow-dominated riparian habitats. Although a few Arroyo Willows are present on this property, within the riparian forest, the habitat on this site is generally unsuitable for this species, in the opinion of the author, based on the quality of the habitat (lacking a thicket). For this reason, the subject site is considered "unoccupied" by Least Bell's Vireo.

Southwestern Willow Flycatcher Habitat Evaluation

Southwestern Willow Flycatcher (*Empidonax traillii extimus*) is a federally listed Endangered migratory songbird that nests in mature riparian vegetation, most typically over running or standing water. The habitat on this property is not suitable for this species, and the site is considered "unoccupied" by Southwestern Willow Flycatcher. The

nearest known populations of this very rare species are in the lower Sweetwater River, several miles to the west of this property.

PROJECT MSCP AND BMO COMPATIBILITY

The conversion of natural habitats in the unincorporated County of San Diego is currently regulated through its Subarea Planning efforts in compliance with the Natural Communities Conservation Program (NCCP) process. The intent of these efforts is to retain large, connected areas of native vegetation in order to preserve habitat values and reduce the threat of endangerment to "covered" species through the retention of essential biotic variability and long-term population viability.

Because the County has adopted a Subarea Plan in compliance with the NCCP, development of the Dotts project site is subject to regulation in conformance with the NCCPs Conservation Guidelines and the BMO. This is because approval of the project would result in a significant loss of native vegetation. In order to approve the project, the County, as Lead Agency, must make determinations and publish certain necessary "Findings" of NCCP and BMO conformance for this project, based primarily on the data presented in this report. These "Findings" include legally-binding statements with respect to the following: (1) The project's consistency with the "Take Authorization" identified in the County's Section 10 (a) Recovery Permit and HCP; (2) Statements and quantification regarding the projects contribution to the regional "Take"; (3) Statements with respect to how approval of the project will not preclude connectivity between areas of high biological habitat values; (4) Statements with respect to how approval of the project is consistent with the Subregional NCCP for this area and the County's Subarea Plan; (5) Statements with respect to how approval of the project will minimize and mitigate to the maximum extent practicable impacts to habitat in accordance with Section 4.3 of the NCCP Guidelines; (6) Statements with respect to how approval of the project will not appreciably reduce the likelihood of the survival and recovery of the California Gnatcatcher or any of the other "covered" species in the wild, and; (7) Statements with respect to how approval of the project and the subsequent removal of habitat is incidental to otherwise lawful activities. The intent of these "Findings" is to ensure that the subject project will comply with the requirements of third-party beneficiary status afforded under the County's 10 (a) permit.

Because the project supports coastal sage scrub vegetation, the County of San Diego, functioning in a third-party permitting role must ensure that all of the requisite "Findings" are complete and accurate. The primary concern of the County and the Wildlife Agencies will be to ensure that not only do the minimal mitigation requirements for projects pursuant to the County of San Diego's BMO be adhered to, but that any onsite preserve design be compatible with wildlife corridor function and long-term habitat viability.

IMPACTS

Impacts to biological resources associated with the Dotts project are assessed as being either “significant” or “less than significant”, as defined by CEQA. The determination of impact significance is based on one or all of the following criteria:

- have a substantial adverse effect on sensitive habitats, species, or raptor foraging or wildlife movement

--or--

- reduce the ability of the County to implement existing or future conservation programs

--or--

- are out of conformance with applicable ordinances, policies and habitat conservation plans

Anticipated impacts to habitats were calculated by determining the acreage of each habitat affected by the site development, including future grading, estimated brush clearing for fire protection and septic installation purposes, and home construction, as expected to occur in the future. These are summarized in Table 3.

Measurable direct impacts would result from the development of the Dotts project site. Direct impacts result from the actual removal of habitat, plants, and animals from the site through grading and brushing, clearing, or thinning for fire protection purposes, agriculture, etc. These direct impacts are considered permanent, because they result in a conversion of habitats to landscaped areas, structures, groves, roads, etc. Indirect impacts also affect habitats, plants, and/or animals residing on or near the project site. These are not the direct result of grading or development. Examples of indirect impacts include introduction of exotic species, human or pet intrusions into natural areas, lighting, traffic, and noise. Indirect impacts are often called "edge effects".

Direct Impacts

Grading associated with the development of the Dotts project site, as presently proposed, could result in the direct impacts that follow. The numbers below were derived by calculating the acreage of the proposed roads, driveways, leach fields, pads, and fire clearing requirements (100' set-back from edge of open space):

- (1) Up to 8.38 acres of Southern Mixed Chaparral, a Tier III habitat-type, will be impacted as a result of site development. The loss of mixed chaparral vegetation is considered **significant**, as defined by CEQA. Mitigation for this loss is required under CEQA and the BMO.
- (2) Up to 9.43 acres of Diegan Coastal Sage Scrub, a Tier II habitat-type, will be impacted as a result of site development. This impact is considered **significant**, as defined by CEQA. Mitigation for this loss is required under CEQA and the BMO. Diegan Coastal Sage Scrub is a depleted habitat-type in San Diego County.

- (3) Impacts to Urban/Developed Habitat are considered **less than significant**, as defined by CEQA and the BMO. Mitigation for this loss is not required.
- (4) Development will require a single CDFG wetland crossing in order to access the southern portions of the property. This crossing has been placed near the western edge of property where it adjoins existing, offsite development. Impacts to CDFG wetlands are considered **significant**. Also impacted will be “waters of the United States” and “waters of the state” within the same drainage. Approximately 0.03 acre of wetlands/waters will be directly impacted by the project. Mitigation for this loss is required pursuant to CEQA, the BMO, the California Fish and Game code, and various other state and federal statutes.
- (5) Development will result in the direct loss of occupied foraging habitat for several species of sensitive plants and animals, including San Diego County Viguiera, Orange-throated Whiptail, Bobcat, Mule Deer, and Bewick’s Wren. Also lost will be habitat supporting various other sensitive species, although much of the undisturbed areas of the site will be conserved in biological open space. The loss of sensitive species habitat, *per se*, is considered **significant**, as defined by CEQA. However, habitat-based mitigation will be provided for this impact (indirectly) through protection of native vegetation that theoretically supports these species.

An impact analysis associated with the various onsite habitats is presented in tabular format in Table 3.

Indirect Impacts

Indirect impacts resulting from changes in land use are anticipated. These are primarily edge effects impacting natural areas and adjoining offsite areas. The uses of trails through and along open space areas are one type of edge effect. Indirect impacts associated with site development (primarily edge effects due to fragmentation of the habitat) are considered **less than significant**. This is because development will be separated from high-value lands located offsite by onsite open space.

Although not directly disturbed by grading, the onsite population of Palmer’s *Ericameria* could be subject to edge effects from surrounding development. This would be considered **significant**, as defined by CEQA.

MITIGATION

As a result of meetings with the County of San Diego regarding the design of the Dotts project, the Tentative Map has been redesigned to address the following:

1. Slope Encroachment. Slope encroachment is proposed notwithstanding requirements of the slope encroachment regulations in the Resource Protection Ordinance. This encroachment is proposed as a means of avoiding or reducing biological impacts to the extent feasible. By encroaching into steep slopes, the revised project has the opportunity to reduce encroachment into biologically sensitive areas.
2. Edge Effects. Edge effect impacts have been reduced by reducing the undulations of the proposed biological open space easement to the extent feasible, while “capturing” the onsite population of Palmer’s Ericameria. Where the OSE lines currently undulate, the lines follow natural contours to the extent feasible. Other measures (see below) to reduce edge effects include fencing or marking of the open space easement, establishing a Limited Building Zone (LBZ) easement, seasonal restrictions on site grading, and the implementation of BMPs. All of these measures will reduce edge effect impacts.
3. Preserve Design. The preserve design associated with the project includes a wildlife corridor of over 1,000 feet from the site to the nearest potential offsite building location. The onsite open space will augment large-block areas of habitat located along the eastern and southeastern portions of the property. This provides increased connectivity to onsite and offsite habitats.

Development of the Dotts property will result in a direct loss of sensitive habitat and sensitive species, as defined by CEQA and the MSCP. Mitigation is thus required to ensure that there is no loss of sensitive habitat values or degradation of significant natural areas as a result of future site improvement. To that end, the applicant is proposing that a portion of the property be placed into perpetual protection within a **Dedicated Biological Open Space Easement** intended to preclude the removal or addition of any thing, including structures and vegetation (Figure 2). This easement should be fenced and clearly marked with high visibility markers (at 100-foot intervals) along its entire length to discourage entry into the natural area. A second easement, which provides a 100-foot fire clearing structural setback from the edge of the biology open space easement, should be incorporated into the project design. This easement should prohibit the construction of structures that could require additional fire clearing, etc. The structural setback easement will preclude fire clearing which otherwise might encroach into the biology open space. This easement is shown on Figure 2 and labeled as the **Limited Building Zone**.

In order to achieve adequate habitat-based mitigation, pursuant to the requirements of the MSCP/BMO, it is recommended that the project applicants provide mitigation at a ratio of 1½:1 and 1:1, respectively, for the loss of 9.43 acres of CSS (Tier II habitat) and 8.38 acres of SMC (Tier III habitat), as specified by the BMO. Onsite credit can be obtained for all areas of CSS and SMC proposed for biological open space, currently totaling 5.32 acres of CSS and 15.0 acres of SMC. This would require the securement of no less than 8.83 acre-credits (@1½:1) of CSS habitat in a County-approved Mitigation Bank within the Metro-Lakeside-Jamul segment of the MSCP. Thus, the total offsite mitigation obligation for upland impacts is 8.83 acres.

Avoidance of the onsite population of Palmer's *Ericameria*, a County Narrow Endemic Species, is also required by the BMO. To that end, edge effects to this population must be eliminated – permanent fencing of the onsite population in this area is strongly recommended, and the population will be included in the biological open space easement.

As originally designed, the project included several wetland crossings. The crossing areas qualified as supporting CDFG wetlands and state and federal "waters". Pursuant to meetings with DPLU staff, the map was redesigned to avoid all but one of these crossings, thus minimizing wetland impacts. Currently, the project will directly impact wetlands in only one location, near the site's western border. The crossing will maintain line-of-sight for small wildlife using the drainage via the use of a 36 " storm drain pipe for movement, and better maintain the viability of the local wildlife corridor through this area, connecting properties to the north and southwest along a continuation of the drainage. No other areas of wetlands habitat or "waters" will be impacted by grading, dredge, or fill.

Because the project will impact wetlands, it will be necessary to obtain various agency permits, including a CDFG 1603 Streambed Alteration Agreement. It will also be necessary to contact the ACoE and CRWQCB concerning a Section 404/401 Permit. These agencies function in a permitting capacity in the event of wetland impacts. At a minimum, notification of the ACOE and CRWQCB is recommended.

All impacts to state or federal wetlands and/or "waters" (see Table 3) will require mitigation at a 3-to-1 ratio, with a minimum 1-to-1 wetlands creation. In addition, all created and/or enhanced wetlands will require no less than five years of biological monitoring and reporting, as well as wetland agency permitting, as discussed above. At this time, offsite wetland creation credits are proposed for wetlands impact mitigation. To that end, it is recommended that the applicant secure no less than 0.09 acres of wetlands creation/enhancement credits in an ACoE, CDFG, and CRWQCB approved location to the satisfaction of the Director of Planning and Land Use (Attachment B). No impacts to RPO wetlands are anticipated, as 100 percent of this resource is conserved in open space (see Figure 2) with an appropriate wetland buffer (50 feet from edge of canopy) incorporated into the easement.

Site brushing, grading, construction and/or the removal of native vegetation or the removal of vegetation within 300 feet of any known migratory songbird nesting location will not be permitted during the spring/summer songbird breeding season, defined as from 15 February to 31 August of each year. This is required in order to insure compliance with the federal Migratory Bird Treaty Act, which prevents the "take" of eggs, nests, feathers, or other parts of most native bird species, and the Federal Endangered Species Act. Limiting activities to the non-breeding season will minimize chances for the incidental take of migratory songbirds or raptors.

Should it be necessary to conduct brushing, grading, or other construction activities during the songbird breeding season, a preconstruction nesting survey of all areas within 300 feet of the proposed activity will be required. The results of the survey will be provided in a report to the Director, Department of Planning and Land Use and the Wildlife Agencies for concurrence with the conclusions and recommendations.

FIGURE 2. BIOLOGICAL RESOURCES AND OPEN SPACE – DOTTS SUBDIVISION PROPERTY

(see 100'-scale Biological Resources and Open Space Exhibit, attached)

BIOLOGICAL RESOURCES EXHIBIT
OPEN SPACE EXHIBIT

PRELIMINARY GRADING PLAN - TM 5300

STAN DOTTS SUBDIVISION
TM 5300RPL4, ER 02-14-054
APN 520-012-15

LEGEND

- = Southern Coast Live Oak Riparian Forest (Holland Code 61310) (encompasses jurisdictional wetlands and "waters" in this location)
- = Diegan Coastal Sage Scrub (Holland Code 32500)
- = Southern Mixed Chaparral (Holland Code 37120)
- = Urban/Developed (Holland Code 12000)
- = unvegetated CDFG Wetlands and Federal/State "Waters"
- = Palmer's Ericameria (Ericameria palmeri ssp. palmeri)
- = Orange-throated Whiptail (Chromidophorus hyperythrus beldingi)
- = Engelmann Oak (Quercus engelmannii)
- = San Diego Sagewort (Artemisia palmeri)

shown: San Diego County Viguiera (co-dominant in the CSS)
Bobcat (movement throughout most of the site)
Mule Deer (movement throughout most of the site)
Bewick's Wren (movement throughout areas of dense brush)

Prepared by:

VINCENT N. SCHEIDT, MA
CERTIFIED BIOLOGICAL CONSULTANT

3158 Occidental Street • San Diego, CA 92122 • (619) 457-3873

HABITAT IMPACT/PRESERVE ANALYSIS: HABITATS: THE DOTTS PROPERTY, TM 5300RPL4, DEHERA

Biological Resource	Total Acres Onsite (Pre-development)	Acres Impacted (Post-development)	Acres Preserved (Post-development)	Mitigation Required	Mitigation Provided
San Coastal Sage Scrub	14.75 acres	9.43 acres	5.32 acres	14.15 @ 1:1	5.32 acres + 8.83 acres needed offsite
Southern Mixed Chaparral	23.38 acres	8.38 acres	15.0 acres	8.38 @ 1:1	8.38 acres + 0.17 acres in excess
Southern Coast Live Oak Riparian Forest	0.46 acres	none	0.46 acres	avoidance	avoidance
Urban/Developed	0.24 acres	0.24 acres	none	none	none
Federal/State "Waters"	n/a	0.03 acres	n/a	0.09 acre @ 3:1	0.09 acre offsite

ASSESSOR'S PARCEL NUMBER:
520-012-15

LOT AREAS:

LOT	GROSS AREA	NET AREA
1	8.00 AC	7.78 AC
2	5.40 AC	4.68 AC
3	5.40 AC	5.34 AC
4	19.34 AC	19.12 AC
TOTAL	38.14 AC	36.90 AC

EARTHWORK:

LOT NO.	CUT (CY)	FILL (CY)	IMPORT/EXPORT (CY)
1	3200	0	
2	1500	6500	
3	7300	2000	
4	5200	5500	
ROAD	6100	2800	
SUBTOTAL	23300	16800	
SHRINKAGE (10%)	-	1700	
TOTAL	23300	18500	4800 (EXPORT)

SOURCE OF TOPOGRAPHY:

PROVIDED BY PHOTO GEODETIC CORP. FLOWN MAY 18, 2005.

NOTE:

THIS PLAN IS PROVIDED TO ALLOW FOR FULL AND ADEQUATE DISCRETIONARY REVIEW OF A PROPOSED DEVELOPMENT PROJECT. THE PROPERTY OWNER ACKNOWLEDGES THAT ACCEPTANCE OR APPROVAL OF THIS PLAN DOES NOT CONSTITUTE AN APPROVAL TO PERFORM ANY GRADING SHOWN HEREON, AND AGREES TO OBTAIN VALID GRADING PERMITS BEFORE COMMENCING SUCH ACTIVITY.

OWNER:

STAN P. DOTTS
2550 WILLOW GLEN DRIVE
EL CAJON, CA 92019
(609) 417-6683



PREPARED BY:



TABLE 2. FLORA AND FAUNA DETECTED – DOTTS SUBDIVISION PROJECT

Scientific Name	Common Name
<u>Plants</u>	
<i>Adenostoma fasciculatum</i>	Chamise
<i>Ambrosia psilostachya</i>	Western Ragweed
<i>Artemisia californica</i>	California Sagebrush
<i>Artemisia douglasiana</i>	Douglas Sagewort
<i>Artemisia palmeri</i>	San Diego Sagewort
<i>Arundo donax</i> *	Giant Wild Reed
<i>Avena</i> sp. *	Wild Oat
<i>Baccharis glutinosa</i>	Mule Fat
<i>Baccharis sarothroides</i>	Broom Baccharis
<i>Brassica geniculata</i> *	Perennial Mustard
<i>Brickellia californica</i>	California Brickellbush
<i>Bromus diandrus</i> *	Ripgut Brome
<i>Bromus rubens</i> *	Foxtail Brome
<i>Calochortus</i> sp.	Mariposa Lily
<i>Calystegia macrostegia</i>	Morning Glory
<i>Carduus tenuiflorus</i>	Italian Thistle
<i>Centaurea melitensis</i> *	Tocalote
<i>Chamaesyce polycarpa</i>	Desert Sand Mat
<i>Chlorogalum parviflorum</i>	Soap Plant
<i>Clarkia</i> sp.	Clarkia
<i>Clematis</i> sp.	Clematis
<i>Corethrogyne filaginifolia</i> var. <i>virgata</i>	Sand Aster
<i>Cryptantha</i> sp.	Cryptantha
<i>Cuscuta ceanothi</i>	Chaparral Dodder
<i>Distichlis spicata</i>	Desert Salt Grass
<i>Eriastrum filifolium</i>	Thread-leaf Eriastrum
<i>Ericameria palmeri</i> ssp. <i>palmeri</i>	Palmer's Ericameria
<i>Eriogonum fasciculatum</i>	Flat-top Buckwheat
<i>Eriogonum</i> sp.	Buckwheat
<i>Eriophyllum confertiflorum</i>	Golden Yarrow
<i>Erodium botrys</i> *	Long-beaked Stork's-bill
<i>Eucalyptus</i> sp. *	Eucalyptus
<i>Filago gallica</i> *	Narrow-leaf Filago
<i>Galium aparine</i> *	Common Bedstraw
<i>Galium nuttallii</i>	Nuttall's Bedstraw
<i>Gutierrezia</i> sp.	Matchweed
<i>Haplopappus squarrosus</i>	Hazardia
<i>Haplopappus venetus</i>	Isocoma
<i>Juglans</i> sp. *	Walnut
<i>Juncus texilis</i>	Basket Rush
<i>Keckiella antirrhinoides</i>	Yellow Bush Penstemon

TABLE 2. FLORA AND FAUNA DETECTED – DOTTS SUBDIVISION PROJECT

Scientific Name	Common Name
<u>Plants (continued)</u>	
<i>Lactuca serriola</i> *	Wild Lettuce
<i>Linanthus dianthiflorus</i>	Ground Pink
<i>Lotus scoparius</i>	Deerweed
<i>Malosma laurina</i>	Laurel Sumac
<i>Marah macrocarpus</i>	Man Root
<i>Microseris lindleyi</i>	Silver Puffs
<i>Mirabilis californica</i>	Coastal Wishbone Plant
<i>Nicotiana glauca</i> *	Tree Tobacco
<i>Opuntia</i> sp. *	Prickly Pear
<i>Oryzopsis miliacea</i> *	Indian Rice Grass
<i>Pellaea mucronata</i>	Bird's-foot Fern
<i>Pennisetum setaceum</i> *	African Fountain Grass
<i>Phacelia ramosissima</i>	Phacelia
<i>Pityrogramma triangularis</i> var. <i>triangularis</i>	Goldenback Fern
<i>Platanus racemosa</i>	California Sycamore
<i>Populus fremontii</i>	Western Cottonwood
<i>Quercus agrifolia</i>	Coast Live Oak
<i>Quercus berberidifolia</i>	Interior Scrub Oak
<i>Quercus engelmannii</i>	Engelmann Oak
<i>Rhamnus crocea</i>	Redberry
<i>Rhus integrifolia</i>	Lemonadeberry
<i>Ricinus communis</i> *	Castor Bean
<i>Salix lasiolepis</i>	Arroyo Willow
<i>Salsola pestifer</i> *	Russian Thistle
<i>Salvia apiana</i>	White Sage
<i>Sambucus mexicanus</i>	Elderberry
<i>Silene</i> sp.	Catchfly
<i>Sonchus asper</i> *	Sow Thistle
<i>Stephanomeria virgata</i>	Stephanomeria
<i>Stipa lepida</i>	Foothill Stipa
<i>Streptanthus heterophyllus</i>	San Diego Jewelflower
<i>Toxicodendron diversilobum</i>	Poison Oak
<i>Viguiera laciniata</i>	San Diego County Viguiera
<i>Xylococcus bicolor</i>	Mission Manzanita
<i>Yucca whipplei</i>	Our Lord's Candle
<u>Birds</u>	
<i>Aphelocoma coerulescens</i>	Scrub Jay
<i>Archilochus anna</i>	Anna's Hummingbird
<i>Buteo jamaicensis</i>	Red-tailed Hawk
<i>Carduelis psaltria</i>	Lesser Goldfinch

TABLE 2. FLORA AND FAUNA DETECTED – DOTTS SUBDIVISION PROJECT

Scientific Name	Common Name
<u>Birds</u>	
<i>Carpodacus mexicanus</i>	Housefinch
<i>Chamaea fasciata</i>	Wrentit
<i>Corvus corax</i>	Common Raven
<i>Mimus polyglottos</i>	Mockingbird
<i>Pipilo crissalis</i>	California Towhee
<i>Pipilo erythrophthalmus</i>	Rufous-sided Towhee
<i>Psaltiriparus minimus</i>	Bushtit
<i>Thryomanes bewickii</i>	Bewick's Wren
<i>Toxostoma redivivum</i>	California Thrasher
<i>Zenaida macroura</i>	Mourning Dove
<u>Plants</u>	
<i>Canis latrans</i>	Coyote
<i>Lynx rufus</i>	Bobcat
<i>Neotoma</i> sp.	Woodrat
<i>Odocoileus hemionus</i>	Mule Deer
<i>Sylvilagus</i> sp.	Rabbit
<i>Thomomys bottae</i>	Valley Pocket Gopher
<u>Reptiles</u>	
<i>Cnemidophorus hyperythrus beldingi</i>	Orange-throated Whiptail
<i>Sceloporus occidentalis</i>	Western Fence Lizard
<i>Uta stansburiana</i>	Side-blotched Lizard
<u>Butterflies</u>	
<i>Anthocharis sara</i>	Sara Orange-tip
<i>Pontia protodice</i>	Common White
<i>Vanessa annabella</i>	West Coast Lady
<i>Glaucopsyche lygdamus</i>	Southern Blue
<i>Vanessa cardui</i>	Painted Lady
<i>Apodemia mormo virgulti</i>	Behr's Metalmark
<i>Anthocharis cethura</i>	Felder's Orange-tip
<i>Vanessa</i> sp.	Lady (Fly by)
<i>Erynnis</i> sp.	Duskywing
<u>Butterflies (cont)</u>	
<i>Callophrys dumetorum</i>	Bramble Hairstreak
<i>Vanessa atalanta</i>	Red Admiral

Total = 76 species of plants, 34 species of animals detected

* = non-native species.

bold = sensitive species

TABLE 3. MINIMAL IMPACT/PRESERVE ANALYSIS: HABITATS: THE DOTTS PROPERTY, DEHESA

Biological Resource	Total Acres Onsite (Pre-development)	Acres Impacted (Post-development)	Acres Preserved (Post-development)	Mitigation Required	Mitigation Provided
Diegan Coastal Sage Scrub	14.75 acres	9.43 acres	5.32 acres	14.15 @ 1½:1	5.32 acres + 8.83 acres needed offsite ¹
Southern Mixed Chaparral	23.38 acres	8.38 acres	15.00 acres	8.38 @ 1:1	8.38 acres + 6.62 acres in excess
Southern Coast Live Oak Riparian Forest	0.46 acres	none	0.46 acres	avoidance	avoidance
Urban/Developed	0.24 acres	0.24 acres	none	none	none
Federal/State wetlands/"waters"	n/a ²	0.03 acre	n/a	0.09 acre @ 3:1	offsite ³

¹ - in a location providing upland habitat credits in a County-approved location

² - acreage included as a part of the adjoining upland habitat

³ - in a location providing wetlands creation credits approved by the ACoE, CDFG, and CRWQCB

TABLE 4. SENSITIVE SPECIES KNOWN FROM THE VICINITY - THE DOTTS PROPERTY, DEHESA

Scientific Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	State Rare	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Closed Cone Forest	Piñon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Probability of Occurrence
<i>Taxidea taxus</i>	American badger					X	X	X		X	X	X		X		X	X			X			L
<i>Bufo microscaphus californicus</i>	Arroyo toad	X				X	X	X	X	X	X									X			L
<i>Amphispiza belli belli</i>	Bell's sage sparrow					X	X				X												M
<i>Nyctinomops macrotis</i>	Big free-tailed bat					X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	M
<i>Poliophtila californica californica</i>	California gnatcatcher		X			X																	L
<i>Quercus cedrosensis</i>	Cedros Island oak						X						X										L
<i>Salvadora hexalepis virgulata</i>	Coast patch-nosed snake					X	X				X			X									M
<i>Charina trivirgata roseofusca</i>	Coastal rosy boa					X	X			X	X												M
<i>Cnemidophorus tigris multiscutatus</i>	Coastal western whiptail						X		X	X	X												M
<i>Piperia cooperi</i>	Cooper's rein orchid					X		X	X		X												L
<i>Piperia lepetopetale</i>	Narrow-petaled rein orchid					X					X								X				L
<i>Nolina interrata</i>	Dehesa beargrass			X			X				X												L
<i>Chaetodipus californicus femoralis</i>	Dulzura CA pocket mouse					X	X	X		X	X	X											M
<i>Calochortus dunnii</i>	Dunn's mariposa lily				X		X				X		X										L
<i>Monardella hypoleuca lanata</i>	Felt leaved rock mint						X				X												L
<i>Polygala cornuta fishiae</i>	Fish's milkwort						X				X												L
<i>Myotis thysanodes</i>	Fringed myotis					X		X	X	X	X	X	X	X						X			M
<i>Senecio ganderi</i>	Gander's butterweed				X		X				X												L
<i>Lepechinia ganderi</i>	Gander's pitcher sage						X																L
<i>Aquila chrysaetos</i>	Golden eagle					X	X	X		X	X	X	X	X									M
<i>Eumops perotis californicus</i>	Greater western mastiff bat					X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	M
<i>Lycaena hermes</i>	Hermes copper					X	X				X												M
<i>Perognathus longimembris internationalis</i>	Jacumba little pocket mouse															X	X				X		L
<i>Ceanothus cyaneus</i>	Lakeside ceanothus						X																L
<i>Myotis evotis</i>	Long eared myotis						X		X	X	X	X	X	X						X			M
<i>Myotis volans</i>	Long legged myotis						X		X	X	X	X	X	X						X			M
<i>Ribes canthariforme</i>	Morena currant						X																L
<i>Felis concolor</i>	Mountain lion					X	X		X	X	X	X	X	X		X	X			X			M
<i>Crotalus ruber ruber</i>	No. red diamond rattlesnake					X	X				X			X		X							M
<i>Cnemidophorus hyperythrus</i>	Orange-throated whiptail					X	X	X	X		X												O
<i>Arctostaphylos otayensis</i>	Otay Manzanita						X						X										L
<i>Lotus crassifolius otayensis</i>	Otay mountain lotus						X						X										L
<i>Antrozous pallidus</i>	Pallid bat					X	X	X	X	X	X	X	X	X		X	X			X			M
<i>Tetracoccus dioicus</i>	Parry's tetracoccus						X				X												L
<i>Chorizanthe leptotheca</i>	Peninsular spine flower						X				X												L
<i>Nyctinomops femorosaccus</i>	Pocketed free-tailed bat					X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		X	M
<i>Lathyrus splendens</i>	Pride of California						X		X		X												L

TABLE 4. SENSITIVE SPECIES KNOWN FROM THE VICINITY - THE DOTTS PROPERTY, DEHESA

Scientific Name	Common Name	Federally Endangered	Federally Threatened	State Endangered	State Rare	Coastal Sage Scrub	Mixed Chaparral	Grassland	Riparian	Oak Woodland	Chamise Chaparral	Mixed Conifer	Closed Cone Forest	Pinon-Juniper	Freshwater Marsh	Desert Scrub	Desert Wash	Salt or Alkali Marsh	Vernal Pools	Montane Meadow	Coastal or Desert Dune	Lakes and Bays	Probability of Occurrence
<i>Chorizanthe procumbens</i>	Prostrate spineflower					X	X				X												M
<i>Euphydryas editha quino</i>	Quino checkerspot butterfly	X				X		X			X					X			X				L
<i>Horkelia truncata</i>	Ramona horkelia					X																	L
<i>Bassariscus astutus</i>	Ringtail					X					X												M
<i>Lepus californicus bennettii</i>	S. D. black-tailed jackrabbit					X	X	X		X	X	X	X										M
<i>Phrynosoma coronatum blainvillei</i>	San Diego horned lizard					X	X	X	X		X	X											M
<i>Diadophis punctatus similis</i>	San Diego ringneck snake					X	X		X	X	X	X	X										M
<i>Satureja chandleri</i>	San Miguel savory					X					X												L
<i>Myotis ciliolabrum</i>	Small-footed myotis					X			X	X	X	X	X	X		X				X			M
<i>Onychomys torridus ramona</i>	Southern grasshopper mouse					X	X	X			X												L
<i>Chamaebatia australis</i>	Southern mountain misery					X					X												L
<i>Odocoileus hemionus</i>	Southern mule deer					X	X	X	X	X	X	X	X	X	X	X	X			X			O
<i>Comarostaphylos diversifolia diversifolia</i>	Summer holly					X							X										L
<i>Cupressus forbesii</i>	Tecate cypress					X							X										L
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat					X	X	X	X	X	X	X	X	X	X	X	X			X			M
<i>Cathartes aura</i>	Turkey vulture					X	X	X	X	X	X	X	X										M
<i>Scaphiopus hammondi</i>	Western spadefoot toad					X	X	X	X	X	X				X				X				M
<i>Myotis yumanensis</i>	Yuma myotis					X	X	X	X	X	X	X	X	X	X			X	X	X		X	M

Probability of Occurrence Codes:

L – Low Probability; rare species in area, and no significant habitat (animals), or distinctive perennial that would not have been missed if present onsite (plants).

M – Moderate Probability; could be expected to occur onsite on at least an occasional basis, based on habitat quality (animals), or could occur onsite, but very rare, and/or poorly known (plants).

H – High Probability; certain to occur onsite on a regular basis (animals), but cryptic, or ephemeral species known from the immediate vicinity, but seasonal in occurrence (plants).

O – Observed; see text for detailed discussion.

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ATTACHMENT A. CNDDDB FORMS AS SUBMITTED TO CALIFORNIA DEPARTMENT OF FISH
AND GAME

For Office Use Only

Source Code _____ Quad Code _____
Elm Code _____ Occ. No. _____
EO Index No. _____ Map Index No. _____

Date of Field Work (mm/dd/yyyy): 06/20/2002

Reset

California Native Species Field Survey Form

Send Form

Scientific Name: Artemisia palmeri

Common Name: San Diego Sagewort

Species Found? ☒ Yes ☐ No If not, why? _____
Total No. Individuals 20 Subsequent Visit? ☐ yes ☒ no
Is this an existing NDDDB occurrence? ☐ no ☒ unk.
Yes, Occ. # _____
Collection? If yes: _____
Number _____ Museum / Herbarium _____

Reporter: Vince Scheidt
Address: 3158 Occidental Street
San Diego, CA 92122
E-mail Address: vince@san.rr.com
Phone: (858) 457-3873

Plant Information

Phenology: 50 % 50 % _____ %
vegetative flowering fruiting

Animal Information

adults # juveniles # larvae # egg masses # unknown
☐ breeding ☐ wintering ☐ burrow site ☐ rookery ☐ nesting ☐ other

Location Description (please attach map **AND/OR** fill out your choice of coordinates, below)

The site is an approximately 38-acre parcel (APN 520-012-15) of vacant land located off Dehesa Road in the Dehesa Valley area of San Diego County (see attached map).

County: San Diego Landowner / Mgr.: Private
Quad Name: Alpine Elevation: _____

T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: ☐ H ☐ M ☐ S ☐ Source of Coordinates (GPS, topo. map & type): _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: ☐ H ☐ M ☐ S ☐ GPS Make & Model _____
DATUM: NAD27 ☐ NAD83 ☐ WGS84 ☐ Horizontal Accuracy _____ meters/feet
Coordinate System: UTM Zone 10 ☐ UTM Zone 11 ☐ OR Geographic (Latitude & Longitude) ☐
Coordinates: _____

Habitat Description (plant communities, dominants, associates, substrates/soils, aspects/slope):

A portion of the Sweetwater River, which supports Southern Coast Live Oak Riparian Forest, crosses the northern end of this property. Indicators in this habitat include Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Western Cottonwood (*Populus fremontii*), Arroyo Willow (*Salix lasiolepis*), and California Sycamore (*Platanus racemosa*). Understory species detected include Desert Grape (*Vitis girdiana*), Poison Oak (*Toxicodendron diversilobum*), Douglas Sagewort (*Artemisia douglasiana*), and many others.

Other rare taxa seen at THIS site on THIS date: Quercus engelmannii, Ericameria palmeri ssp. palmeri
(separate form preferred)

Site Information Overall site/occurrence quality/viability (site + population): ☐ Excellent ☐ Good ☐ Fair ☐ Poor

Immediate AND surrounding land use: Areas adjoining the property support similar native habitats and low-density residential development

Visible disturbances: _____

Threats: San Diego Sagewort is growing along a road and could be threatened by future road widening or fuel management

Comments: _____

Determination: (check one or more, and fill in blanks)

- ☐ Keyed (cite reference): _____
☐ Compared with specimen housed at: _____
☐ Compared with photo / drawing in: _____
☐ By another person (name): _____
☐ Other: _____

Photographs: (check one or more)

Plant / animal ☐ Slide ☐ Print ☐ Digital
Habitat ☐ ☐ ☐
Diagnostic feature ☐ ☐ ☐

May we obtain duplicates at our expense? yes ☐ no ☐

For Office Use Only

Source Code _____ Quad Code _____
Elm Code _____ Occ. No. _____
EO Index No. _____ Map Index No. _____

Date of Field Work (mm/dd/yyyy): 06/20/2002

Reset

California Native Species Field Survey Form

Send Form

Scientific Name: *Ericameria palmeri ssp. palmeri*

Common Name: Palmer's Ericameria

Species Found? ☒ Yes ☐ No If not, why? _____
Total No. Individuals 60 Subsequent Visit? ☐ yes ☒ no
Is this an existing NDDDB occurrence? ☐ no ☒ unk.
Yes, Occ. # _____
Collection? If yes: _____
Number _____ Museum / Herbarium _____

Reporter: Vince Scheidt
Address: 3158 Occidental Street
San Diego, CA 92122
E-mail Address: vince@san.rr.com
Phone: (858) 457-3873

Plant Information

Phenology: 100% vegetative _____% flowering _____% fruiting

Animal Information

adults # juveniles # larvae # egg masses # unknown
☐ breeding ☐ wintering ☐ burrow site ☐ rookery ☐ nesting ☐ other

Location Description (please attach map AND/OR fill out your choice of coordinates, below)

The site is an approximately 38-acre parcel (APN 520-012-15) of vacant land located off Dehesa Road in the Dehesa Valley area of San Diego County (see attached map).

County: San Diego Landowner / Mgr.: Private
Quad Name: Alpine Elevation: _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ Source of Coordinates (GPS, topo. map & type): _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ GPS Make & Model _____
DATUM: NAD27 ☐ NAD83 ☐ WGS84 ☐ Horizontal Accuracy _____ meters/feet
Coordinate System: UTM Zone 10 ☐ UTM Zone 11 ☐ OR Geographic (Latitude & Longitude) ☐
Coordinates: _____

Habitat Description (plant communities, dominants, associates, substrates/soils, aspects/slope):

Most south-facing slopes of the property support Diegan Coastal Sage Scrub vegetation. Indicators in this habitat include California Sagebrush (*Artemisia californica*), Flat-top Buckwheat (*Eriogonum fasciculatum*), Laurel Sumac (*Malosma laurina*), Yellow Bush Penstemon (*Keckiella antirrhinoides*), White Sage (*Salvia apiana*), and other native shrubs and subshrubs. This vegetation is well developed and of a high quality, supporting various sensitive species such as Palmer's Ericameria, Orange-throated Whiptail, and others.

Other rare taxa seen at THIS site on THIS date: *Quercus engelmannii*, *Artemisia palmeri*
(separate form preferred)

Site Information Overall site/occurrence quality/viability (site + population): ☐ Excellent ☒ Good ☐ Fair ☐ Poor

Immediate AND surrounding land use: Areas adjoining the property support similar native habitats and low-density residential development

Visible disturbances:

Threats: Site immediately adjoining to be developed

Comments:

Determination: (check one or more, and fill in blanks)

- ☐ Keyed (cite reference): _____
☐ Compared with specimen housed at: _____
☐ Compared with photo / drawing in: _____
☐ By another person (name): _____
☐ Other: _____

Photographs: (check one or more) Slide Print Digital
Plant / animal ☐ ☐ ☐
Habitat ☐ ☐ ☐
Diagnostic feature ☐ ☐ ☐

May we obtain duplicates at our expense? yes ☐ no ☐

For Office Use Only

Source Code _____ Quad Code _____
Elm Code _____ Occ. No. _____
EO Index No. _____ Map Index No. _____

Date of Field Work (mm/dd/yyyy): 06/20/2002

Reset

California Native Species Field Survey Form

Send Form

Scientific Name: Quercus engelmannii

Common Name: Engelmann Oak

Species Found? ☒ Yes ☐ No If not, why? _____
Total No. Individuals 1 Subsequent Visit? ☐ yes ☒ no
Is this an existing NDDB occurrence? ☐ no ☒ unk.
Yes, Occ. # _____
Collection? If yes: _____
Number _____ Museum / Herbarium _____

Reporter: Vince Scheidt
Address: 3158 Occidental Street
San Diego, CA 92122
E-mail Address: vince@san.rr.com
Phone: (858) 457-3873

Plant Information

Phenology: 100% vegetative _____% flowering _____% fruiting

Animal Information

adults _____ # juveniles _____ # larvae _____ # egg masses _____ # unknown _____
☐ breeding ☐ wintering ☐ burrow site ☐ rookery ☐ nesting ☐ other

Location Description (please attach map AND/OR fill out your choice of coordinates, below)

The site is an approximately 38-acre parcel (APN 520-012-15) of vacant land located off Dehesa Road in the Dehesa Valley area of San Diego County (see attached map).

County: San Diego Landowner / Mgr.: Private
Quad Name: Alpine Elevation: _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ Source of Coordinates (GPS, topo. map & type): _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ GPS Make & Model _____
DATUM: NAD27 ☐ NAD83 ☐ WGS84 ☐ Horizontal Accuracy _____ meters/feet
Coordinate System: UTM Zone 10 ☐ UTM Zone 11 ☐ OR Geographic (Latitude & Longitude) ☐
Coordinates: _____

Habitat Description (plant communities, dominants, associates, substrates/soils, aspects/slope):

A portion of the Sweetwater River, which supports Southern Coast Live Oak Riparian Forest, crosses the northern end of the property. Indicators in this habitat include Coast Live Oak (*Quercus agrifolia*), Engelmann Oak (*Quercus engelmannii*), Western Cottonwood (*Populus fremontii*), Arroyo Willow (*Salix lasiolepis*), and California Sycamore (*Platanus racemosa*). Understory species detected include Desert Grape (*Vitis girdiana*), Poison Oak (*Toxicodendron diversilobum*), Douglas Sagewort (*Artemisia douglasiana*), and many others.

Other rare taxa seen at THIS site on THIS date: Ericameria palmeri ssp. palmeri, Artemisia palmeri
(separate form preferred)

Site Information Overall site/occurrence quality/viability (site + population): ☐ Excellent ☒ Good ☐ Fair ☐ Poor

Immediate AND surrounding land use: Areas adjoining the property support similar native habitats and low-density residential development

Visible disturbances: _____

Threats: _____

Comments: _____

Determination: (check one or more, and fill in blanks)

- ☐ Keyed (cite reference): _____
☐ Compared with specimen housed at: _____
☐ Compared with photo / drawing in: _____
☐ By another person (name): _____
☐ Other: _____

Photographs: (check one or more)

Plant / animal ☐ Slide ☐ Print ☐ Digital ☐
Habitat ☐ ☐ ☐ ☐
Diagnostic feature ☐ ☐ ☐ ☐

May we obtain duplicates at our expense? yes ☐ no ☐

For Office Use Only

Source Code _____ Quad Code _____
Elm Code _____ Occ. No. _____
EO Index No. _____ Map Index No. _____

Date of Field Work (mm/dd/yyyy): 09/02/2002

Reset

California Native Species Field Survey Form

Send Form

Scientific Name: *Viguiera laciniata*

Common Name: San Diego County Viguiera

Species Found? ☒ Yes ☐ No If not, why? _____
Total No. Individuals 5000 Subsequent Visit? ☐ yes ☒ no
Is this an existing NDDB occurrence? ☐ no ☒ unk.
Yes, Occ. # _____
Collection? If yes: _____
Number _____ Museum / Herbarium _____

Reporter: Vince Scheidt
Address: 3158 Occidental Street
San Diego, CA 92122
E-mail Address: vince@san.rr.com
Phone: (858) 457-3873

Plant Information

Phenology: 50% vegetative _____% flowering 50% fruiting

Animal Information

adults # juveniles # larvae # egg masses # unknown
☐ breeding ☐ wintering ☐ burrow site ☐ rookery ☐ nesting ☐ other

Location Description (please attach map AND/OR fill out your choice of coordinates, below)

The site is an approximately 38-acre parcel (APN 520-012-15) of vacant land located off Dehesa Road in the Dehesa Valley area of San Diego County (see attached map).

County: San Diego Landowner / Mgr.: Private
Quad Name: Alpine Elevation: _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ Source of Coordinates (GPS, topo. map & type): _____
T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ GPS Make & Model _____
DATUM: NAD27 ☐ NAD83 ☐ WGS84 ☐ Horizontal Accuracy _____ meters/feet
Coordinate System: UTM Zone 10 ☐ UTM Zone 11 ☐ OR Geographic (Latitude & Longitude) ☐
Coordinates: _____

Habitat Description (plant communities, dominants, associates, substrates/soils, aspects/slope):

Most south-facing slopes of the property support Diegan Coastal Sage Scrub (CSS) vegetation. Indicators in this habitat include California Sagebrush (*Artemisia californica*), Flat-top Buckwheat (*Eriogonum fasciculatum*), Laurel Sumac (*Malosma laurina*), Yellow Bush Penstemon (*Keckiella antirrhinoides*), White Sage (*Salvia apiana*), and other native shrubs and subshrubs. This vegetation is well developed and of a high quality, supporting various sensitive species such as Palmer's *Ericameria*, Orange-throated Whiptail, and others. San Diego County *Viguiera* is relatively abundant onsite within the CSS and in some areas is a co-dominant species.

Other rare taxa seen at THIS site on THIS date: *Cnemidophorus hyperythrus*, *Ericameria palmeri* ssp. *palmeri*, *Quercus engelmannii*, *Artemisia palmeri*

Site Information Overall site/occurrence quality/viability (site + population):

☐ Excellent ☒ Good ☐ Fair ☐ Poor

Immediate AND surrounding land use: Areas adjoining the property support similar native habitats and low-density residential development

Visible disturbances: _____

Threats: A portion of the onsite population of this species will be removed by development

Comments: _____

Determination: (check one or more, and fill in blanks)

- ☐ Keyed (cite reference): _____
☐ Compared with specimen housed at: _____
☐ Compared with photo / drawing in: _____
☐ By another person (name): _____
☐ Other: _____

Photographs: (check one or more)

Slide Print Digital
Plant / animal ☐ ☐ ☐
Habitat ☐ ☐ ☐
Diagnostic feature ☐ ☐ ☐

May we obtain duplicates at our expense? yes ☐ no ☐

For Office Use Only

Source Code _____ Quad Code _____
Elm Code _____ Occ. No. _____
EO Index No. _____ Map Index No. _____

Date of Field Work (mm/dd/yyyy): 09/02/2002

Reset

California Native Species Field Survey Form

Send Form

Scientific Name: *Cnemidophorus hyperythrus*

Common Name: Orange-throated Whiptail

Species Found? ☒ Yes ☐ No If not, why? _____
Total No. Individuals 3 Subsequent Visit? ☐ yes ☒ no
Is this an existing NDDDB occurrence? ☐ no ☒ unk.
Yes, Occ. # _____
Collection? If yes: _____
Number _____ Museum / Herbarium _____

Reporter: Vince Scheidt
Address: 3158 Occidental Street
San Diego, CA 92122
E-mail Address: vince@san.rr.com
Phone: (858) 457-3873

Plant Information

Phenology: _____% vegetative _____% flowering _____% fruiting

Animal Information

3
adults # juveniles # larvae # egg masses # unknown
☒ breeding ☐ wintering ☐ burrow site ☐ rookery ☐ nesting ☐ other

Location Description (please attach map AND/OR fill out your choice of coordinates, below)

The site is an approximately 38-acre parcel (APN 520-012-15) of vacant land located off Dehesa Road in the Dehesa Valley area of San Diego County (see attached map).

County: San Diego Landowner / Mgr.: Private

Quad Name: Alpine Elevation: _____

T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ Source of Coordinates (GPS, topo. map & type): _____

T _____ R _____ Sec _____, _____ 1/4 of _____ 1/4, Meridian: H ☐ M ☐ S ☐ GPS Make & Model _____

DATUM: NAD27 ☐ NAD83 ☐ WGS84 ☐ Horizontal Accuracy _____ meters/feet

Coordinate System: UTM Zone 10 ☐ UTM Zone 11 ☐ OR Geographic (Latitude & Longitude) ☐

Coordinates: _____

Habitat Description (plant communities, dominants, associates, substrates/soils, aspects/slope):

Specimens are anticipated in most open areas of the site, particularly adjacent to areas of dense brush.

Other rare taxa seen at THIS site on THIS date: *Viguiera laciniata*, *Ericameria palmeri* ssp. *palmeri*, *Quercus engelmannii*,
(separate form preferred) *Artemisia palmeri*

Site Information Overall site/occurrence quality/viability (site + population): ☐ Excellent ☒ Good ☐ Fair ☐ Poor

Immediate AND surrounding land use: Areas adjoining the property support similar native habitats and low-density residential development

Visible disturbances: _____

Threats: A portion of the onsite population of this species will likely be affected by development

Comments: _____

Determination: (check one or more, and fill in blanks)

- ☐ Keyed (cite reference): _____
☐ Compared with specimen housed at: _____
☐ Compared with photo / drawing in: _____
☐ By another person (name): _____
☐ Other: _____

Photographs: (check one or more)

	Slide	Print	Digital
Plant / animal	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Habitat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Diagnostic feature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

May we obtain duplicates at our expense? yes ☐ no ☐

ATTACHMENT B. VERIFICATION OF OFFSITE WETLAND MITIGATION CREDIT
SECUREMENT

(to be provided prior to recordation of the Final Map)